

First round of data requests to Dominion Energy South Carolina, Inc.

prepared by London Economics International LLC

August 24th, 2021



London Economics International LLC ("LEI") was selected by the Public Service Commission of South Carolina ("SC PSC") to serve as a qualified, independent third-party consultant in Docket No. 2021-88-E, Dominion Energy South Carolina, Inc. ("DESC")'s 2021 avoided cost proceeding.

This document contains the first set of data requests ("DRs"), LEI-1, to DESC.

1 Instructions

1. Responses to these requests should be provided to Stella Mueller via email (stellam@londoneconomics.com) within twenty (20) calendar days of the date of service. Responses should be provided as soon as practicable.
2. Responses to these requests should be labeled using the same numbers as used in Section 3 below.
3. If the requested information is found in other places or in other exhibits, reference shall not be made to those, but instead, the information should be reproduced and placed in the responses to these requests in the appropriate sequence.
4. All documents shall be provided in their native format (e.g., Word, Excel, PowerPoint), with all functions, data, and formulas intact.
5. These requests shall be deemed continuing so as to require DESC to supplement or amend its responses as any additional information becomes available, up to October 13th, 2021 – i.e., the last day that LEI is scheduled to testify in the above referenced docket.
6. Answer each request on the basis of the entire knowledge of DESC, including information in the possession of DESC or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.
7. If any request cannot be answered in full, please respond to the extent possible and specify the reasons for DESC's inability to respond.

2 Definitions

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. "Application" is defined as the application filed by Dominion Energy South Carolina, Inc. on April 22nd, 2021, or as otherwise revised.

2. "DESC" is defined as Dominion Energy South Carolina, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.
3. "Workpapers" and "documents" are defined in the broadest terms and should not be construed as limited to the listed examples, or limited only to items that are currently within DESC's control or custody. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams, drawings, maps, surveys, plans, charts, graphs, data, computer files, billings, evaluations, photographs, audio tapes, and videotapes.

3 Data requests

- LEI-1.1** Please provide a copy of all questions, information and data requests submitted to DESC by parties in the above referenced docket, including, but not limited to the Office of Regulatory Staff ("ORS"), the South Carolina Department of Consumer Affairs ("DCA"), the Carolinas Clean Energy Business Association ("CCEBA"), and Pine Gate Renewables, LLC ("PGR").
- LEI-1.2** Please provide a copy of all materials provided by DESC to parties in this docket, in response to the requests detailed in LEI-1.1.
- LEI-1.3** Please provide all workpapers and source documents supporting DESC's application, testimony, and exhibits, including specifically, but not limited to, all calculations and supporting material associated with determination of avoided energy and capacity rates and variable integration costs.
- LEI-1.4** Please provide all reports or other documents, including work papers and source documents, supporting the direct and rebuttal testimonies and exhibits of James W. Neely, Allen W. Rooks, John E. Folsom, Jr., Peter B. David, Daniel F. Kassis, Eric H. Bell, and Thomas E. Hanzlik.